

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

TEAMSTERS HEALTH AND WELFARE	:	CIVIL ACTION
FUND, PHILADELPHIA AND VICINITY, et al.	:	
	:	
Plaintiffs	:	
	:	
v.	:	
	:	
NET CONSTRUCTION, INC.	:	NO. 02-4639
	:	
Defendant	:	
	:	
and	:	
	:	
COMMERCE BANK	:	
	:	
	:	
Garnishee	:	

**INTERROGATORIES IN ATTACHMENT**

TO: Commerce Bank  
1900 Market Street  
Philadelphia, PA 19103

You are hereby required to file answers to these Interrogatories within twenty (20) days after service upon you. Failure to do so may result in Judgment against you. "Defendant(s)" as used herein refers to NET Construction, Inc.

1. At the time you were served or at any subsequent time, did you owe the Defendant(s) any money or were you liable to the Defendant(s) on any negotiable or other written instrument, or did the Defendant(s) claim that you owed any money or were liable to the Defendant(s) for any reasons?

2. If the Answer to Interrogatory No. 1 is yes, please state:

- (a) What amount is owed to the Defendant(s) and for what money are you liable to the Defendant(s);
- (b) Describe the type of negotiable or written instrument under which this claim is owed.

3. At the time you were served or any subsequent time, was there in your possession, custody or control, or in the joint possession, custody or control of yourself and one or more persons, any property of any nature owned solely or in part by the Defendant(s)?

4. If the Answer to Interrogatory No. 3 is yes, please state:

- (a) A description of the property which is in your possession, custody or control or in the joint possession, custody or control of yourself and one or more persons;
- (b) The fair market value of that property.

5. At the time you were served or any subsequent time, did you hold legal title to any property of any nature owned solely or in part by the Defendant(s) or in which the Defendant(s) held or claimed any interest(s)?

6. If the Answer to Interrogatory No. 5 is yes, please state:

- (a) A description of the nature of the property;
- (b) The fair market value of the property;
- (c) The value of the Defendant(s)' claim, interest and/or equity in the property.

7. At the time you were served or any subsequent time did you hold as fiduciary any property in which the Defendant(s) has or claimed an interest?

8. If the Answer to Interrogatory No. 7 is yes, please:

- (a) Describe the property which you held as fiduciary;
- (b) State the fair market value of the property.

9. At any time before or after you were served with these Interrogatories, did the Defendant(s) transfer or deliver any property to you or to any person or place pursuant to your direction or consent and what was the consideration therefore?

10. If the Answer to Interrogatory No. 9 is yes, please:

- (a) Specifically describe the property delivered or transferred;
- (b) State the fair market value of such property.

11. At any time after you were served with these Interrogatories, did you pay, transfer or deliver any money or property to the Defendant(s) or to any person or place pursuant to the Defendant(s)' direction or otherwise discharge any claim of the Defendant(s) against you?

12. If the Answer to Interrogatory No. 11 is yes, please:

- (a) Describe the property or money paid, transferred or delivered;
- (b) To whom or to what place the property was paid, transferred or delivered;
- (c) The fair market value of the property.

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Date: \_\_\_\_\_